

UNITED STATES DISTRICT COURT


for the

Western District of Louisiana

Division

OTC
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TONY R. MOORE, CLERK
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT, LOUISIANA
BY Case No. **21-cv-4061**

(to be filled in by the Clerk's Office)

Theodore Fikre

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Lumen Inc

Jeff Storey - CEO & President

See attached form for the full list of defendants

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Theodore Fikre
Street Address	432 N. Armistead St. Apt T2
City and County	Alexandria
State and Zip Code	VA 22312
Telephone Number	202-553-7804
E-mail Address	theodorefikre@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Lumen Technologies Inc
Job or Title <i>(if known)</i>	
Street Address	100 CenturyLink Drive
City and County	Monroe
State and Zip Code	LA 71203
Telephone Number	318-388-9000
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	Jeff Storey
Job or Title <i>(if known)</i>	CEO and President - Lumen
Street Address	1025 ELDORADO BLVD INTERLOCKEN 2000
City and County	Broomfield
State and Zip Code	CO 80021-8254
Telephone Number	720-888-9018
E-mail Address <i>(if known)</i>	jeff.storey@lumen.com

Defendant No. 3

Name	Shaun Andrews
Job or Title <i>(if known)</i>	Executive Vice President and Chief Marketing Officer- Lumen
Street Address	1025 ELDORADO BLVD INTERLOCKEN 2000
City and County	Broomfield
State and Zip Code	CO 80021-8254
Telephone Number	720 888 7796
E-mail Address <i>(if known)</i>	shaun.andrews@lumen.com

Defendant No. 4

Name	Neel Dev
Job or Title <i>(if known)</i>	Executive Vice President and Chief Financial Officer - Lumen
Street Address	1025 ELDORADO BLVD INTERLOCKEN 2000
City and County	Broomfield
State and Zip Code	CO 80021-8254
Telephone Number	720 888 1731
E-mail Address <i>(if known)</i>	Neel.dev@lumen.com

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

- ☒ Federal question ☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

- Infringement against my right enumerated in the 1st Amendment of the United States Constitution
- Infringement against my right enumerated in the 4th Amendment of the United States Constitution
- Infringement against my right enumerated in the 7th Amendment of the United States Constitution
- Infringement against my right enumerated in the First Amendment of the United States Constitution
- Infringement against my right enumerated in the 10th Amendment of the United States Constitution
- Infringement against my right enumerated in the 13th Amendment of the United States Constitution
- Infringement against my right enumerated in the 14th Amendment of the United States Constitution

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* Theodore Fikre, is a citizen of the
State of *(name)* Virginia

b. If the plaintiff is a corporation

The plaintiff, *(name)*, is incorporated
under the laws of the State of *(name)*,
and has its principal place of business in the State of *(name)*

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* Jeff Storey, is a citizen of

the State of (name) Colorado . Or is a citizen of
(foreign nation) _____ .

b. If the defendant is a corporation

The defendant, (name) Lumen Technology Inc , is incorporated under
the laws of the State of (name) Louisiana , and has its
principal place of business in the State of (name) Louisiana .
Or is incorporated under the laws of (foreign nation) the United States of America ,
and has its principal place of business in (name) Monroe, LA .

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

I am suing Lumen Technology Inc for damages of \$10,000,000 to include current damages and future loss of income

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

I am filing this lawsuit due to Lumen Technologies and the defendants named herein's decision to mandate their employees to get "vaccinated" or face termination by January 4, 2022. As such, I assert the following damages:

1. Whereas the defendants are infringing on my rights of privacy enshrined in the US Constitution and the Bill of Rights
2. Whereas the defendants are forcing employees to partake in experimental procedures that do not prevent contraction nor transmission of Covid-19
3. Whereas the medical procedures are causing harm and death to tens of thousands of participants
4. Whereas Biden's executive order was violated by the 5th Circuit Court
5. Whereas OSHA is no longer compelling employees to mandate these experimental medical procedures to their employees
6. Whereas the defendants have no legal standing to trample upon their employees religious, political or personal beliefs
7. Whereas I work at home on a fulltime basis so my personal decisions have no impact on the decisions of co-workers
8. Whereas the defendants onerous mandate is causing me undue stress and having a negative impact on my health
9. Whereas my future earnings will be severely impacted due to an imminent firing that will taint my otherwise stellar career

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IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Primarily, I am seeking an immediate injunction against Lumen Technologies Inc and all the defendants named herein against their unconstitutional "vaccine" mandate which has no legal basis and is infringing on my rights as a US citizen and an employee in good standing with my employer

Additionally, I am seeking relief in the amount of \$10,000,000 for current and future damages. My imminent termination due to my decision to not take part in a medical experiment has led to emotional and physical ramifications which have caused a tremendous financial strain.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Date of signing: 11/24/2021

Signature of Plaintiff

Printed Name of Plaintiff Theodore Fikre

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____

Additional Defendants:

Name: Jeff Storey

Position: CEO & President – Lumen

State of Name: Colorado

Name: Shaun Andrews

Executive Vice President and Chief Marketing Officer – Lumen

State of Name: Colorado

Name: Richard Batelaan

Position: Executive Vice President, North America Operations – Lumen

State of Name: Colorado

Name: Neel Dev

Position: Executive Vice President and Chief Financial Officer – Lumen

State of Name: Colorado

Name: Andrew Dugan

Position: Chief Technology Officer – Lumen

State of Name: Colorado

Name: Stacey W. Goff

Position: Executive Vice President, General Counsel and Secretary – Lumen

State of Name: Colorado

Name: Fletcher Keister

Position: Executive Vice President, Chief Transformation Officer – Lumen

State of Name: Colorado

Name: Edward Morche

Position: President, North American Enterprise and Public Sector – Lumen

State of Name: Colorado

Name: Maxine L. Moreau

Position: President, Mass Markets – Lumen

State of Name: Colorado

Name: Laurinda Pang

Position: President, Global Customer Success -Lumen

State of Name: Colorado

Name: Scott A. Trezise

Position: Executive Vice President, Human Resources – Lumen

State of Name: Colorado

Name: Shannon Klug

Position: Lead HR Advisor – Lumen

State of Name: Colorado